



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

July 23, 1999

Larry Trowsdale
IMC Chemicals Inc.
P.O. Box 367
Trona, California 93592-0367

RE: Modification to UIC Class III Permit # CAS0000000002

Dear Mr. Trowsdale:

EPA has reviewed your request, dated July 2, 1999, for a modification to permit # CAS0000000002. Specifically, you requested that EPA change the operator name from North American Chemical Company (NACC) to IMC Chemicals Inc. (IMCC). EPA hereby approves this name change to IMCC. This is a minor modification as described under 40 CFR Part 144.41.

Based on your description in the July 2, 1999 letter, EPA considers the 250 heated brine wells at the Searles Dry Lake facility to be Class III injection wells. If these wells are located within the project area of permit # CAS0000000002, these wells are authorized by the permit. The status of these Class III wells (i.e., the number in operation) should be included in the quarterly reports.

If you have any questions, please call Gregg Olson of my staff at (415) 744-1828.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wendy L. Nelson", is written over the typed name.

for Laura Tom Bose, Chief
Ground Water Office